



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

November 13, 2012

Mr. David Maurer  
Acting District Ranger  
Black Mesa Ranger District  
P.O. Box 968  
Overgaard, Arizona 85933

Subject: Draft Environmental Impact Statement for the Rim Lakes Forest Restoration Project, Coconino County, Arizona (CEQ# 20120307)

Dear Mr. Maurer:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Rim Lakes Forest Restoration Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA commends the Forest Service for the commitment demonstrated in the Rim Lakes Forest Restoration Project (Project) to restore ponderosa pine and mixed conifer forests on approximately 33,600 acres within Apache-Sitgreaves National Forests. We strongly support the restoration goals for this Project, as well as those developed for the broader Four Forest Restoration Initiative, the landscape-scale planning effort to restore 2.4 million acres of forest lands in northern Arizona.

Based on our review of the DEIS, we have rated the preferred alternative and the document as LO-1, Lack of Objections – Adequate (see enclosed EPA Rating Definitions). The EPA acknowledges the need for the use of mechanical thinning and broadcast burning to achieve long-term restoration objectives. We commend the Forest Service for committing, in the preferred alternative, to strong best management practices and soil and water conservation practices to protect sensitive resources during mechanical harvest and fire treatments.

We recognize the challenge the Forest Service faces by implementing a restoration plan that will rely heavily on broadcast burning. The potential impacts to human health from the smoke produced from prescribed burning is stated in the DEIS as one of the major concerns raised by the public during scoping—a concern likely to be realized for the residents of Heber/Overgaard and Forest Lakes, communities whose prospects of receiving smoke impacts from Project prescribed fire are described in the DEIS as “almost inevitable.” Additionally, three active fuel treatment projects are adjacent to, or in close proximity of, the Project area. We recommend that the Final EIS identify specific BMPs and a strategy for working with the interagency Smoke Management Group to reduce emissions from prescribed burns and wildfires to the greatest possible extent.

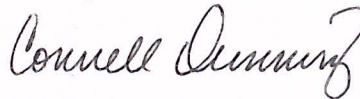
We also recommend that the Forest Service provide additional information, in the FEIS, about the effects of climate change on the Project. The DEIS describes that, when completed, the preferred alternative will improve tree resilience, and thus, the ability of the forests to better adapt to climate change. But the DEIS does not describe how the potential effects of climate change, including warmer temperatures, reduced precipitation, and species migration, among other impacts, may affect the

Project's restoration efforts. We recommend that the Project's adaptive management plan include a commitment to monitor, mitigate, and respond to, the effects of climate change throughout the life of the Project.

Please note that, as of October 1, 2012, EPA Headquarters no longer accepts paper copies or CDs of EISs for official filing purposes. Submissions must be made through the EPA's new electronic EIS submittal tool: *e-NEPA*. To begin using *e-NEPA*, you must first register with the EPA's electronic reporting site - [https://cdx.epa.gov/epa\\_home.asp](https://cdx.epa.gov/epa_home.asp). Electronic submission does not change requirements for distribution of EISs for public review and comment, and lead agencies should still provide one hard copy of each Draft and Final EIS released for public circulation to the EPA Region 9 office in San Francisco (Mail Code: CED-2).

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. If you have any questions, please contact me at 415-972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at 415-947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

Sincerely,



*For*

Kathleen Martyn Goforth, Manager  
Environmental Review Office

Enclosure: Summary of the EPA Rating System



## **SUMMARY OF EPA RATING DEFINITIONS\***

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

### **ENVIRONMENTAL IMPACT OF THE ACTION**

#### ***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### ***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### ***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### ***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

### **ADEQUACY OF THE IMPACT STATEMENT**

#### ***"Category 1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### ***"Category 2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### ***"Category 3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

